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Publication of Model Notice for Employers to Use Regarding Eligibility for Premium Assistance Under Medicaid or the Children's Health Insurance Program, Notice

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Publication of Model Notice for Employers to Use Regarding Eligibility for Premium Assistance Under Medicaid or the Children's Health Insurance Program, Notice

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General Comment

Questions on sending out model notices:

1. If an Employer only covers full time employees on their group health plans and has part time and seasonal employees, is the Employer required to send out the notice to ALL employees including those not eligible for the group health plan? In a conversation with one of the Representatives at DOL, the response was yes, but I believe that this would defeat the purpose since one of the criteria for an Employer to send out the notice is that the Employer contribute at least 40% of the premium for the Employee or is the 40% no longer a criteria?
2. In case the answer is still a YES to the first question above, does the notice have to be sent to each part time and seasonal employee? If so, must the Employer, in order to ensure that everyone gets a notice, make a list and check that list to make sure that each employee is sent a notice? Doing so could be very time consuming and expensive for the Employer who may then decide that the business is not worth continuing because of the prohibitive costs and administrative nightmare.